

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**CARMEN OTERO MC CULLOCH,**

**Civil Action No. 07 CIV 9780  
(LAP) (RLE)**

**PLAINTIFF,**

**v.**

**TOWN OF MILAN, TOWN OF MILAN TOWN  
BOARD, JOHN V. TALMADGE, Town  
Supervisor, and ALFRED LO BRUTTON,  
PAULINE COMBE-CLARK, DIANE MAY, and  
ROSS WILLIAMS, Councilpersons; TOWN OF  
MILAN PLANNING BOARD, LAUREN KINGMAN,  
Chairman, and Members JEFFREY ANAGOS,  
PETER GOSS, SHEILA MARGIOTTA, MARY ANN  
HOFFMAN, AND PAULINE COMBE-CLARK;  
And GARY E. BECK, Zoning Enforcement Officer,  
Town of Milan; And Frank Margiotta, Barbara  
Hughey, And Charlotte Norman**

**DEFENDANTS.**

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**PLAINTIFF'S MEMO OF LAW IN OPPOSITION TO  
DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

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**Respectfully submitted,**

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